

Message

**From:** Dixon Monty USGR [monty.dixon@syngenta.com]  
**Sent:** 10/25/2020 12:38:59 PM  
**To:** Kenny, Daniel [Kenny.Dan@epa.gov]  
**CC:** Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Hathaway, Margaret [Hathaway.Margaret@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]; Meadows, Sarah [Meadows.Sarah@epa.gov]; Crawford, Lydia [Crawford.Lydia@epa.gov]  
**Subject:** FW: Label Comments  
**Attachments:** 000100-01623.20200812D.A21472\_PLUS\_VAPORGRIP\_TECHNOLOGY.AMEND.AUG2020-CL.pdf; 000100-01623.20200812D.A21472\_PLUS\_VAPORGRIP\_TECHNOLOGY.AMEND.AUG2020-HI.pdf; Single edits since Oct 23 2020 000100-01623.20200812D.A21472\_PLUS\_VAPORGRIP\_TECHNOLOGY.AMEND.AUG2020-HI.pdf

Good Morning Dan,

Last night I sent clean and highlighted files in response to the Agency's comments in your October 23 email. The highlighted version highlights all of the edits from 8/13, 9/28, 10/20 and 10/24. In order to hopefully simplify and facilitate the Agency's review, I have prepared another review version that only highlights the changes made in response to the October 23 email. I have included this simplified version along with the versions sent last night in case it is easier to have all three versions on the same email. Accordingly, please find enclosed the following files/description:

File Name	Description
000100-01623.20200812D.A21472_PLUS_VAPORGRIP_TECHNOLOGY.AMEND.AUG2020-CL.pdf	Clean pdf version incorporating all changes through 10/24/2020
000100-01623.20200812D.A21472_PLUS_VAPORGRIP_TECHNOLOGY.AMEND.AUG2020-HI.pdf	Highlighted pdf version incorporating all changes through 10/24/2020
Single edits since Oct 23 2020 000100-01623.20200812D.A21472_PLUS_VAPORGRIP_TECHNOLOGY.AMEND.AUG2020-HI.pdf	Highlighted pdf version incorporating all changes through 10/24/2020 but only highlighting changes since 10/23/2020

I hope this is helpful,

Monty

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**From:** Dixon Monty USGR  
**Sent:** Saturday, October 24, 2020 10:59 PM  
**To:** Kenny, Daniel <Kenny.Dan@epa.gov>  
**Cc:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>  
**Subject:** RE: Label Comments

Hi Dan,

Please find two copies (one highlighted and one clean) of the A21472 Plus VaporGrip Technology label. We have made the majority of the changes as requested (highlighted in Syngenta) however there are two requested edits that we would like to discuss further with the Agency. I have identified these as comments in the highlighted version. Please note that

there was also a question asked in the Agency's label comments related to the smaller list of states that are allowed for preplant applications to cotton. This is based on potential s-metolachlor related crop injury to cotton from preemergence applications that can occur outside of the listed states. This is consistent with cotton label use directions from registered S-metolachlor containing products such as Dual Magnum on cotton.

Edits version submitted 8/13/2020
Edits version submitted 9/28/2020
Edits version submitted 10/20/2020
Edits version submitted 10/24/2020

Thanks and please feel free to contact me on my cell at anytime tomorrow or Monday if I can provide additional information.

Monty

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**From:** Dixon Monty USGR

**Sent:** Friday, October 23, 2020 9:59 PM

**To:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>

**Cc:** Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Hathaway, Margaret <[Hathaway.Margaret@epa.gov](mailto:Hathaway.Margaret@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>; Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>

**Subject:** RE: Label Comments

Hi Dan,

Thanks, we will use this version.

Monty

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**From:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>

**Sent:** Friday, October 23, 2020 9:57 PM

**To:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>

**Cc:** Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Hathaway, Margaret <[Hathaway.Margaret@epa.gov](mailto:Hathaway.Margaret@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>; Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>

**Subject:** RE: Label Comments

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Sorry Monty, please use this file instead. I found one more thing.

Thanks,

Dan

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**From:** Kenny, Daniel

**Sent:** Friday, October 23, 2020 9:39 PM

**To:** [monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)

**Cc:** Echeverria, Marietta (<[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>) <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Hathaway, Margaret

<Hathaway.Margaret@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Meadows, Sarah  
<Meadows.Sarah@epa.gov>; Schmid, Emily (Schmid.Emily@epa.gov) <Schmid.Emily@epa.gov>; Crawford, Lydia  
<Crawford.Lydia@epa.gov>

**Subject:** Label Comments

Hi Monty. Please see attached for EPA's comments on the latest draft labeling. Let us know if there are any issues that we need to discuss.

Thanks,  
Dan

Daniel Kenny, Chief  
Herbicide Branch  
Registration Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency

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